

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

GELLYFISH TECHNOLOGY OF TEXAS, LLC

v.

ALLTEL CORP., ET AL.

NO. 2:11-cv-00216-DF -CE

JURY TRIAL DEMANDED

**PLAINTIFF'S ANSWER TO HP'S COUNTERCLAIMS**

Plaintiff Gellyfish Technology of Texas LLC ("Gellyfish") answers the counterclaims of Defendant Hewlett-Packard Corp. ("HP") (Dkt. No. 107) by corresponding paragraph number as follows:

- 1-2. Admitted.
3. Admitted as to subject matter jurisdiction counterclaims. Denied as to merits of counterclaims.
4. Admitted that venue is proper. Denied there is a more proper or convenient venue for this action.
- 5-6. Admitted.
7. Admitted that a case or controversy exists for the purposes of subject matter jurisdiction, but denied as to the merits of HP's counterclaims.
8. Gellyfish incorporates its answers to paragraphs 1-7 above.
- 9-10. Denied.
11. Gellyfish incorporates its answers to paragraphs 1-10 above.
- 12-13. Denied.
14. To the extent necessary, Gellyfish denies that HP is entitled to the relief requested in its prayer for relief. In addition, to the extent necessary, Gellyfish generally denies any

allegation in the counterclaims not specifically admitted above, and Gellyfish re-alleges infringement, enforceability, validity and damages, and denies any allegations in the counterclaim adverse to same.

PRAYER FOR RELIEF

WHEREFORE, Gellyfish respectfully requests that this Court enter judgment denying and dismissing HP's counterclaims, and that the Court enter judgment in favor of Gellyfish as requested in Gellyfish's complaint, as amended or supplemented.

July 27, 2011

Respectfully submitted,

GELLYFISH TECHNOLOGY OF TEXAS  
LLC

By: //s/ John J. Edmonds

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**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

July 27, 2011

/s/ John J. Edmonds

John J. Edmonds